

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

No. 4:20CR00107

Judge: Mazzant

v.

ANITA MOODY

DEFENDANT, ANITA MOODY'S MOTION FOR CONTINUANCE

COMES NOW ANITA MOODY, DEFENDANT, in the above cause and files this her Motion for Continuance and would respectfully show unto the Court as follows:

I.

This case was originally set for sentencing on October 1, 2020. At that time, the Court advised the Defendant and Counsel that it was reluctant to follow the existing plea agreement reached with the United States Attorney's Office. The Court, on oral motion from Defense Counsel, agreed to allow the Defendant until December 4, 2020, to respond to the Pre Sentence Investigation Report with objections and responses. The Court further set sentencing for that same date of December 4, 2020. Since that time, the Defendant and her Counsel have been diligently seeking to cooperate with the United States Attorneys office with regard to restitution and investigation of the offense. Additionally, coincident to the filing of this Motion, she has filed objections and responses to the Pre-Sentence Investigation Report and a Sentencing Memorandum with supporting arguments. The Defendant has requested additional time to fully explore every opportunity that may be available so that the same may be presented on her behalf at the time of sentencing. Defendant

respectfully requests a 60 day continuance so that the matters relevant to the sentencing process can be completely addressed for the benefit of the Court and the Defendant.

II.

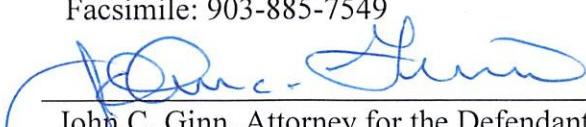
This continuance is not sought for delay only but so that justice might be done. This motion is unopposed.

III.

Wherefore, premises considered, the Defendant requests that this Court grant the requested relief and continue sentencing for an additional 60 days and for such other and further relief as to which she may be entitled.

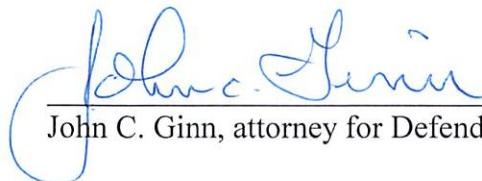
Respectfully submitted,

Smith McDowell Ginn
P.O. Box 493
Sulphur Springs, TX 75483
Telephone: 903-885-3116
Facsimile: 903-885-7549


John C. Ginn, Attorney for the Defendant
State Bar No.: 07966900
jcginn@easttexaslaw.com

CERTIFICATE OF SERVICE

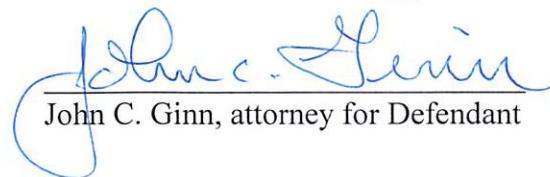
I certify that on November 24, 2020, the foregoing motion for continuance has been forwarded been forwarded by electronic filing to Maureen Smith, Assistant United States Attorney by electronic means.



John C. Ginn, attorney for Defendant

CERTIFICATE OF CONFERENCE AND VERIFICATION THAT THIS MOTION IS UNOPPOSED

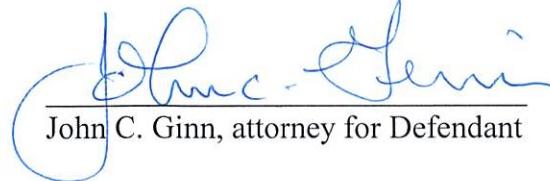
I hereby certify that I have communicated with the Assistant United States Attorney, Maureen Smith, on November 24, 2020, and that this Motion For Continuance is Unopposed.



John C. Ginn, attorney for Defendant

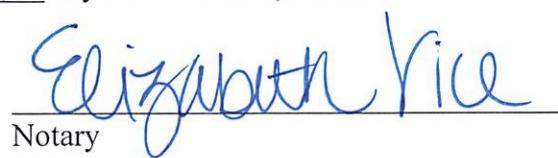
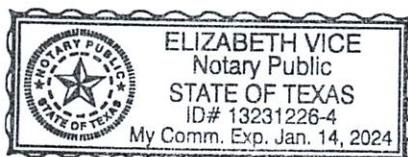
VERIFICATION

My name is John C. Ginn, attorney for the Defendant, Anita Moody, and I am personally familiar with the facts contained in the above Motion for Continuance, and the same are within my personal knowledge and are true and correct.



John C. Ginn, attorney for Defendant

Sworn to and subscribed before me on this 24 day of November, 2020.



Elizabeth Vice
Notary